

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO.

RECEIVED AND FILED - SJ-PR

USBC '22 JAN 20 PM2:14

RE: HÉCTOR E. COLÓN-RODRÍGUEZ,
DEBTOR

CASE NO. 21-03364 (MFC)
CHAPTER 7

URGENT COMPLEMENTARY¹
DEBTOR'S INFORMATORY MOTION IN RESPONSE TO
COUNSEL'S MOTION TO WITHDRAW AS COUNSEL OF RECORD

TO THE HONORABLE COURT:

For the reason set forth below, I, DEBTOR HECTOR E. COLON-RODRIGUEZ, respectfully request the retention of prestigious attorney RAUL E. BANDAS (BANDAS), for my case of the caption, prays to the Hon. Court to not to grant his dismissal from this case.

The debtor also wants to clarify certain distorted and opinionated commentaries made by Counsel as a "reason" for his withdrawal. The adjectives used by Counsel, are not true and publicly degrade my persona.²

This petition to retain counsel might be seen as a contradiction when my clarifying points are read. Despite the things to challenge his accusations, **counsel is a great and seasoned bankruptcy lawyer**, and it would be preferable for most of the impacted (The Court, the debtor, the creditors) to retain him, especially now that the petition is almost, if not completed filled and presented.

¹ This is a COMPLEMENTARY Motion to the one presented by the debtor on 22 Jan 13 (Attachment 1).

² "MOTION TO WITHDRAW AS COUNSEL OF RECORD. 22 Jan 03 (Attachment 2).

The “behavioral reasons” given by Bandas are not entirely correct because they are not based on facts (except his 60 hours of service) but in his personal opinion, and are an apparent excuse to hide mistakes made since the beginning, such as not being present to correctly teach the debtor, to assume that the debtor is as knowledgeable as the counsel, to assume that the debtor had no other situations to deal with, by not reading provided supporting documents on time, by not listening to the client’s questions and observations, and undermining debtor’s esteem, etc. Nothing that he says about the debtor is entirely true³.

The debtor believes that the counsel’s real motive to withdraw is because he is losing money. “*So far we have dedicated more than 60 hours...*” But if this was the case, he should have not degraded the debtor’s alleged behavior in public using his opinion, not facts (Attachment 1 & 2).

OPPOSITION TO HIS RESIGNATION

The case is an advanced stage and will complicate matters to the Hon. Court, to pauper debtor that’s being paid by *Servicios Legales de Puerto Rico* and to creditors. If BANDAS resigned *Servicios Legales de Puerto Rico* may not pay for another lawyer.

The debtor’s situation is more complicated because he has no extraneous help from family, has health problems, is disabled, and only receives a small income. On the other hand, and after all the situations, the case is in an advanced stage, and I believe it will not be good either for the Hon. The court, the debtor, and the creditors.

Counsel uses these demeaning-opinionated adjectives to cause a bad impression about the debtor at the Hon. Court and to the public, and to “prove” that he did the best of himself. Oftentimes he used similar adjectives in front of the debtor.

It is normal that a person like me, who is new to this extremely difficult bankruptcy process, and without proper training by counsel, make mistakes. BANDAS wants to blame another person because he has also made a series of training and filing omissions and mistakes, therefore

³ Debtor is a human and not perfect and makes mistakes as Counsel does.

amendments, some mistakes that I had to correct to help and give the most accurate information as required. I corrected him with addresses, quantities, and other information. When doing so he became stressed.

He omits to mention that he did not frequently read the supplied documents nor paid attention to the debtor's doubts and questions, he did not pay attention when debtor pointed out what seemed relevant and did not want me to talk in his office or the phone, or to participate actively in the process. I feared every encounter with BANDAS because he oftentimes demeaned and yelled at me. In his own words, the debtor *"produced irrelevant information to substantiate his petition..."*

But "irrelevant information" or otherwise "relevant information" was never told by the teacher to the apprentice in a cordial-humane manner these complicated procedures: **he believes that the student should know the discipline before taking the course.** He assumed that I was a lawyer and that I should have had all the information at hand, correlate the information with complex documents, and knew difficult vocabulary.

Because his allegations about the debtor are not true, I also want with want to clarify them:

1. On September the 20th, 2021 BANDAS was graciously hired by *Servicios Legales de Puerto Rico*. On September 22nd, 2021, BANDAS emailed me some 20 undecipherable Bankruptcy Documents, without any explanation on the alien legal-accounting vocabulary and its correlation with documents, and demanded the following to DEBTOR:

"Deberá proveer toda la información solicitada en dichos formularios, imprimir los mismos, y luego guardar los formularios en su computadora. Luego envíeme los formularios (borradores) para mi revisión y estudio. Esto le ahorrará tiempo y esfuerzo en el trámite de la presentación de quiebras."

2. BANDAS wasted almost 20 days because he left the debtor completely alone for 17 days with the extremely difficult documents full of legal accounting vocabulary extraneous for a Biologist. The debtor procured the service of a Paralegal at *Servicios Legales* and after she reviewed the pack of documents, he said that it was BANDAS's responsibility to fill them up.

She -the Paralegal- went to the Director until BANDAS was called by the Director of *Servicios Legales* one Friday. Next Monday I was with him, with these and other supplementary documents. He wouldn't let me talk, add any information, or even ask a question. He made clear that his time was precious: *"To meet with you I had to cancel other important clients, he said."* This took about 5 hours, hours that he complained to be wasted from his precious time.

3. I am not a lawyer, nor am I familiar with the difficult proceedings for bankruptcy. From the start counsel berated and ridiculed me for not knowing the process, he would not clarify the process and did nothing to educate me as to what was happening. Rather counsel simply demanded that I produce different documents as if I had access to a fax, copier, color printer, or other office equipment. Even after I provided counsel with electronic copies of said documents, he would not take the time to review them and simply demanded them again at another meeting, or worse, later say that I gave the information from one day to another.
4. Counsel assumed that I had access to all my records at my fingertips when this was not the case (the debtor had to investigate and make trips and phone calls to different entities to get the most accurate information) and despite me doing everything possible to provide said documents, he did not attempt to peruse the electronic records which I provided. Essentially Counsel was not counseling me in this process. Rather demanded, belittled, and berated me at every meeting we had, frequently reminding me of how much my case was costing him.
5. None of BANDAS's allegations are true, he has his part in the blaming. His last allegation of my not providing that I was a party litigant in connection with a counterclaim filed against my other siblings, is not true, he knew and had the full corresponding documentation of Civil Case, which indicates the lack of counseling that Bandas provided, or attention paid to the debtor. And that is the poor level of legal advice that I had been receiving.
6. Since I was receiving this service pro bono, I tolerated the insults and insinuations made by Counsel upon my person. However, the declarations made by Counsel in this Motion while

maybe his impression of what has happened is not my recollection of our abusive meetings, but the language he used was common when communicating with me, making me feel miserable. I had to keep my mouth shut. I had no other option, I resisted until all the documents and amendments were filled and submitted to the Hon. Court.

7. To the extent that he allowed me, I have fully cooperated with counselor BANDAS and have provided all information promptly (all documents to disprove his derogatory allegations can be provided upon request). BANDAS often would disregard my registered information and later *discover* that this additional information was already presented to him and was pertinent to my case. By the time of his discovery, he had already filled and submitted a document without all this detail, and then he had to amend the document.
8. In his Jan. 3, 2022, allegations, he is not saying accurate things, and I quote:

- a. "As recently as yesterday (Sic), the debtor reported for the first time three claims there were new (Sic) priority unsecured claims..."

This is not true, I was just reminded of something that he knew since the beginning of the case, that three inherited property taxes were not found anywhere in the documentation that he had filled. BANDAS was informed by DEBTOR about these claims ever since the inception of the process and apparently, he forgot about them. Now he wants to blame the debtor for his omission. I can prove him wrong. He had these debts months in advance. These debts are related to Civil Cases BDP2009-0027 and B4CI 2019, brought to BANDAS since the start. Thus, he knew about these "unsecured claims" months in advance, and not "yesterday."⁴

- b. "Further, in the mist (Sic) of the 341 Creditors 'meeting held on December 21, 2021; the debtor announce he was a partly litigant in connection with a counterclaim filed against the other siblings. This information had never been

⁴ This is an example of Counsel's confusion: Debtor was never explained by BANDAS "unsecured debts" as well as many other concepts and pretends, in his MOTION that debtor knew the vocabulary.

reported to the undersigned despite frequent reminders to the Debtor that he needs convey accurate information to the Court..."⁵

This affirmation is also untrue because Bandas had these documents before the meeting correlated to case BDP2009-0027 and B4CI 2019. In addition, I believe hearing from my other Civil Case Lawyer that he had personally communicated with both BANDAS and the TRUSTEE and made clarifications weeks in advance of the Trustee Meeting.

9. Possible already said, I would try to consult with BANDAS, he would become irritated with me because I believe, my *pro bono* case was complicated, and telling him to revise provided documents already in his hands, would cause him more work or stress than he did not hide from me. He often implied that he was *losing money* in my case. His body language told many more things, including the rise of his pitch of voice another octave of the pentagram.
10. Despite that BANDAS has not been a good teacher, I have done my best to supply all the relative and pertinent information despite BANDAS. His unwillingness to properly introduce the debtor to the complex bankruptcy process or explain the complex legal vocabulary was crucial from the beginning. I wasted 17 days in Limbo. When I told him things that I believed were relevant, he often shut me down and did not pay attention to the information. If the information was excessive or extraneous, that was my lawyer, BANDAS. responsibility to distinguish between relative and non-relative content to my case.
11. I am not a lawyer, am a scientist and educator. My English is not good, nor I am familiar with the proceedings and technical vocabulary for bankruptcy. Nor BANDAS wanted to be a teacher. How does he blame me, using derogatory words as if I was irresponsible if never took the time to have structured learning?

⁵ Bandas knew about this counterclaim but makes us believe that I first mentioned it after a question of the TRUSTEE. In other words, TRUSTEE knew this counterclaim using a document provided by me to BANDAS.

12. Counsel simply demanded that I produce different documents, fill difficult legal forms, with strange vocabulary, and acted as if I had access to all my records at my fingertips despite me doing everything possible to provide said documents, or answer my questions, he perused the electronic records which I provided in an almost daily fashion of in an electronic compilation, even weeks in advance.
13. Even BANDAS demanded me to work on Christmas 2021 (Dec 25,2021), a sacred day, and this one was very important because I had a visit from one of my siblings, a son that was going to spend this important day with me, for the first time after 35 years. If spending Christmas with my son made me a *"procrastinator,"* I am one.
14. Even after I provided counsel with electronic copies of said documents, he oftentimes would not take the time to review them, if not reminded to and simply demanded them again or another meeting context, or worse, when shown the document sent weeks in advance, he argued that *"I was providing information from one day to another"* as he said in his MOTION.
15. Essentially Counsel was not counseling me in this process. He believed that I was a connoisseur of the bankruptcy lingo. He rather harshly demanded mis accused me of the complications in part created by his lack of patience, empathy, and guidance. I am an educator, and I cannot expect the same from him, that he is as a doer. Rather demanded, belittled, and berated me at every meeting or call that we had, *frequently reminding me of how much my case was costing him.*
16. I believe to be true his sentence: *"So far we have dedicated over 60 hours in connection with the preparation of the debtor's Bankruptcy Petition and amended filings."* But I also believe that if BANDAS had taken time to show me the difficult terms and documentation or refer me to a site for orientation (and not assume that I knew this difficult process) by way, the most difficult and painful process that I have experienced in my entire life is this bankruptcy process.

17. As BANDAS complained too often of the difficulties of the case and on several occasions, he mentioned that he was losing money, I believe that *losing money* is the real reason for withdrawal, not my alleged behavior.

WHY HIS RETENTION?

18. NEVERTHELESS, I consider BANDAS one of the best lawyers in Puerto Rico, despite his sometimes temperamental, biased, antagonistic, and unemphatic behavior. I must clarify that BANDAS was not always in bad temper, possible other factors were affecting him as well.

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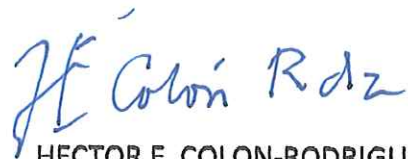
19. As I said, I tolerated these behaviors because I knew that he has also demonstrated to me to have a good heart and I knew he was going to finish submitting all documentation. After calming down by his insulting adjectives, he did an excellent job and I want to retain him. The worst part has passed.

CERTIFICATE OF SERVICE

The undersigned debtor hereby certifies that, on this date, a copy of this document was filed with the Clerk of Court through emergencyfiling@prb.uscourts.gov. The undersigned further certifies that the foregoing has been served on Counsel Raúl Bandas and his email address rbandas@bandaslaw.com, and the Chapter 7 Trustee.

RESPECTFULLY SUBMITTED

This, 18 days of January 2022, in San Juan, Puerto Rico.



HECTOR E. COLON-RODRIGUEZ
Debtor 21-03364
Hecolon.historia@gmail.com

1051 calle 3 SE Apto. 814
San Juan, PR 00921-3014

⁶ It is entirely possible that the Counsel, like any human, is going through other simultaneous difficulties.

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IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF PUERTO RICO.

RECEIVED AND FILED - SJ-PR

RE: HÉCTOR E. COLÓN-RODRÍGUEZ,

CASE NO. 21-03364 (MFC)

USDC '22 JAN 15 PM 3:02

DEBTOR

**DEBTOR'S INFORMATIVE MOTION IN RESPONSE TO
MOTION TO WITHDRAW AS COUNSEL OF RECORD.**

TO HONORARY COURT

I, HECTOR E. COLON-RODRIGUEZ (to simplify "I" or DEBTOR), for the reason set forth below, respectfully request the RETENTION OF DISTINGUISHED attorney RAUL E. BANDAS (to simplify: BANDAS), for my case of the caption, and reply to his opinionated accusations.

This petition to retain him will be seen as contradictory when the clarifying points are read, points that I must bring up replying to his derogatory and opinionated comments to support his dismissal. Despite the things to be described to challenge his accusations, he is a great seasoned bankruptcy lawyer and I want to retain him.

- 1) In his motion (Attachment 1), BANDAS's accusations about me, are totally untrue, insulting, and based only on his opinions, not on real facts. We believe that his

motivations are more economic than factual, but since he is harming my persona, I must reply.

- 2) On July 29, 2021, the money of my bank account increased by receiving a delayed inheritance 10 years before (PR BDP2009-0027 now BACC120190012), but on July 29, 2021, was garnished by another undefended Civil Case (PR K CDC2013-1081, *Compañía de Parques Nacionales vs Fundación Eco-Cultural, Inc*, erroneously mention its president or DEBTOR as "owner"
- 3) The potential money that could be garnished approaches \$80,000. They took off about \$18,000.
- 4) Since I needed a job, and since by default any money entering my personal account will be taken, I became scared (In an instant I became poorer than I thought).
- 5) Legal advisors told me to go to Bankruptcy court to *solve my problems*.
- 6) Being a *pauper*, I went to *Servicios Legales de Puerto Rico (Programa de Práctica Compensada)* and they assigned me BANDAS, on Monday, September the 20th, 2021, almost a month later the June 29 State Judicial Garnishing.
- 7) In the middle of this unexpected, garnished action the PR Judge in my siblings' case BACC120190012 the Hon. Judge in case from *Tribunal de Aibonito* ordered me to provide all evidence for a *vista*, a process that took me a whole week, a week lost in the Bankruptcy case.
- 8) And BANDAS does not mention this situation and other circumstances as I am a disabled person (declared by the USA Social Security Administration) and have other circumstances to take care.

- 9) At the beginning of this process, the 22 of September 2021, BANDAS emailed me 20 excruciating Bankruptcy forms, full of difficult legal and accounting terminology, **without any explanation** or guidance and pressured me to start filing them quickly. He ordered the following to DEBTOR:

Deberá proveer toda la información solicitada en dichos formularios, imprimir los mismos, y luego guardar los formularios en su computadora. Luego envíeme los formularios (borradores) para mi revisión y estudio. Esto le ahorrará tiempo y esfuerzo en el trámite de la presentación de quiebras.

- 10) BANDAS did not give any information on how to fill the forms, he did not clarify the new and complex vocabulary that was not easy to understand and had many threatening warnings, in case one made mistakes and he left me alone for more than two weeks. BANDAS does not say this in his withdrawal motion. DEBTOR wasted two weeks and couldn't sleep with these extraneous.

- 11) Moreover, as English is not my first language, they were very difficult to fill without assistance from a lawyer or a paralegal. For two weeks I was left completely alone with the documents and was not until I sought help from a paralegal in *Servicios Legales*. The paralegal said that the filling of the document had to be performed and was the obligation to be filled by BANDAS, and then he was on a Friday called by the Director of *Servicios Legales*. BANDAS, next Monday following the phone call, gave me 5 unstructured hours of his time, even these 5 hours were not sufficient for my comprehension of this new procedure and complicated vocabulary. He did not admit any questions on my part and **badly** complained that *he has lost 5 valuable hours of his precious time*. He does not mention that 17 important days were lost because of this mistake.

- 12) I must add that I am a scientist and a teacher and tend to have more empathic behavior toward my students, and I expect more structured teaching. BANDAS was improvising and showed a bad temper for *wasting five hours of his time*.
- 13) Despite his unorthodox methods, I fully cooperated with BANDAS and provided him with ALL INFORMATION IN A TIMELY MANNER as the process was developing (all documents were provided upon request and many others that he did not ask but that considered important).
- 14) BANDAS often would disregard my supplied information, not read emails with new information, and later realize that this additional information was pertinent to my case, he then had to make changes and then he blamed me for such changes.
- 15) Not having a steady job, I had to verify information with past employments, in other to give the most accurate to the Hon. Court. My attention to offering accurate details vs approximated quantities were also irritating to BANDAS.
- 16) BANDAS did not realize that my US SS disability and other health issues, scientific and, uncertainties in this new bankruptcy was a new world for me.
- 17) BANDAS, as a seasoned bankruptcy lawyer, would often use irritating and loud language, a shrill voice, demanding, in hostile, and demeaning behavior toward me, during our meetings and telephone conversations. He was often intimidating and irritable which caused me to be afraid to ask him questions.
- 18) I have done my best to supply all the relative and pertinent information to BANDAS. If the information was excessive or extraneous, it was BANDAS. responsibility to distinguish between relative and non-relative content to my case. I am not an attorney, but he is.

- 19) I gave BANDAS many documents since the onset of the case and perhaps weeks in advance to December 21, 2021, 341 meetings, I made a big digital file with compartments and electronically sent it to him, he was supposed to supply it to the Síndico. All documents requested by Síndico were organized in this digital archive that BANDAS had a copy. This file is available for examination and to disprove his allegations.
- 20) So, it is wrong his claim that *"As recently as yesterday [Sunday, Jan 2, 2022] debtor reported for the first time three priority unsecured claims...."* This is not true. Bandas had this information since the beginning of the relationship and that info can be provided. Moreover, it is also not true that ["for the first time"] the debtor announced he was a party litigant with a counterclaim filed against his other siblings."
- 21) These words are not true because Bandas had these information weeks previously the 341 Creditor's Meeting held on Dec 21, 2021. Even, my lawyer in the Civil Case BACC2019001 called BANDAS to remind him that he had to take into consideration all the contents related to this case and use its elements in the Bankruptcy. So not only DEBTOR provided information to BANDAS on time, but my other lawyer did and now BANDAS is blaming me for his own omission.
- 22) It was the brightness of the *Síndico*, in a question made to the debtor that "opened" the omission Bandas already made and was archived in the many documents supplied to him. He had not noticed its importance, and now he is blaming me.
- 23) As a *pauper*, debtor using *Servicios Legales*, and after many complaints that BANDAS made that he was losing money (please see *"we have dedicated over 60 hours in connection to the preparation..."*) I strongly believe that his motivations are economic in

essence, and he is using his derogatory untrue comments about myself as an excuse to withdraw from the case and demean my reputation. I can show the Honorable court that BANDAS was provided on time with documents and emails, and that possibly he overlooked it or omitted the information. After all, I am not a lawyer, but he is.

24) Despite everything said, I want BANDAS to remain in my case, despite his bad temper and other derogatory behaviors, I prefer stability in the process.

25) In addition, I am poor and *Servicios Legales* might not pay for another counsel.

CERTIFICATE OF SERVICE

The undersigned debtor hereby certifies that, on this date, a copy of this document was filed with the Clerk of Court through the emergencyfiling@prb.uscourts.gov site and I hope that the Court will provide notice of this filing to all counsels of record in the captioned case. The undersigned further certifies that the foregoing has been served on Counsel Raúl Bandas at his PO Box 361773, San Juan, PR 00936-1773, and his email address rbandas@bandaslaw.com, the Chapter 7 Trustee, and to parties in interest.

RESPECTFULLY SUBMITTED

This, 13 days of January 2022, in San Juan, Puerto Rico.



HECTOR E. COLON-RODRIGUEZ
1051 calle 3 SE Apto. 814 San Juan, PR 00921-3014

A-2

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO. 21-03364 (MCF)

HECTOR E. COLÓN-RODRÍGUEZ

DEBTOR

MOTION TO WITHDRAW AS COUNSEL OF RECORD

TO THE HONORABLE COURT:

COMES NOW Debtor Héctor E. Colón-Rodríguez, through the undersigned counsel, and very respectfully avers and prays as follows:

1. For the reasons set forth below, the subscribing attorney respectfully requests leave from the Court to withdraw as counsel for the debtor in the case of caption.
2. Despite repeated attempts to assist the debtor in submitting accurate, timely, and relevant information to this Honorable Court and the designated Chapter 7 Trustee in support of his Chapter 7 Bankruptcy Petition, the debtor's procrastinating and uncooperative conduct makes it virtually impossible for the undersigned to continue to render effective legal representation to the debtor. During the last several months the debtor either frequently failed to produce in a timely fashion information in support of the various schedules and official forms which require, and have required, amended filings to his Bankruptcy Petition; produced irrelevant information to substantiate his petition; assured as complete and correct amended

submissions of schedules and official forms but then produces information which challenges previously reported information, etc.

3. In sum, our dedicated effort to assist the debtor with his Bankruptcy Petition is thwarted by his own conduct which further produces unnecessary amendments and submissions to the Court. So far, we have dedicated over 60 hours in connection with the preparation of the debtor's Bankruptcy Petition and amended filings. As recently as yesterday, the debtor reported for the first time three new priority unsecured claims and deleted a previously listed priority unsecured claim from Schedule E/F (Creditors Who Have Unsecured Claims). Further, in the midst of the 341 Creditors' Meeting held on December 21, 2021, the debtor announced he was a party litigant in connection with a counterclaim filed against his other siblings. This information had never been reported to the undersigned despite frequent reminders to the Debtor that he needs convey accurate information to the Court, the Chapter 7 Trustee, and the undersigned. Changes in the debtor's financial affairs have to be reported to the Court and the Chapter 7 Trustee, which, in turn, causes unnecessary and repeated filings of amended schedules.

WHEREFORE, Debtor Colón-Rodríguez respectfully requests this Court to take notice of the above and GRANT this request to withdraw as counsel of record for the debtor.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk of Court of the US Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed therein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that, on this date, a copy of this document was filed with the Clerk of Court through the CM/ECF system, which will provide notice of this filing to all counsels of record in the captioned case. The undersigned further certifies that the foregoing has been served on Debtor Hector E. Colón-Rodríguez at his home mailing address (1051 1 SE Street, 013 Medical Center Plaza Building, San Juan, Puerto Rico 00921) and via email at hecolonhistoria@gmail.com, the US Trustee, the Chapter 7 Trustee, and to parties in interest with an email registered with the CM ECF system that have notices of appearance pursuant to General Order 05-09, included in the service list attached to the original hereof.

RESPECTFULLY SUBMITTED.

This, 3rd day of January, 2022, in San Juan, Puerto Rico.

**//S//
RAUL E. BANDAS
Counsel for Debtor
USDC-PR 207809**

**THE LAW OFFICE OF RAUL E. BANDAS LLC
Capital Center Building Office
San Juan, Puerto Rico**

**PO Box 361773
San Juan, Puerto Rico 00936-1773
Ph. 787-503-9695 / 787-242-9695
E-mail: rbandas@bandaslaw.com**